

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf  
of themselves and all other similarly situated,

**Plaintiffs,**

V.

AMAZON.COM, INC., a Delaware corporation,

**Defendant.**

No. 2:20-cv-00424-JHC

**STIPULATED MOTION AND  
ORDER REGARDING SEALING  
OF PLAINTIFFS' MOTION TO  
COMPEL AMAZON TO PRODUCE  
DOCUMENTS AND  
INFORMATION RESPONSIVE TO  
PLAINTIFFS' SEVENTH SET OF  
REQUESTS FOR PRODUCTION  
AND FOURTH SET OF  
INTERROGATORIES**

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated.

**Plaintiffs.**

V.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

**Plaintiffs,**

V.

AMAZON.COM, INC., a Delaware corporation,

**Defendant.**

No. 2:22-cv-00965-JHC

**STIP. MOT. & ORDER RE  
SEALING OF MTN. TO COMPEL**  
(No. 2:20-cv-00424-JHC; No. 2:21-cv-00693-JHC; No. 2:22-cv-00965-JHC)

1       The Parties have met and conferred with respect to Plaintiffs' intended Motion to Compel  
2 Amazon to Produce Documents and Information Responsive to Plaintiffs' Seventh Set of  
3 Requests for Production and Fourth Set of Interrogatories, and anticipate that their briefs,  
4 declarations, and exhibits will quote from and/or describe in detail a significant amount of  
5 information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes  
6 Only by Amazon. Accordingly, in order to ensure that such materials are treated appropriately  
7 under the applicable protective order, and to reduce burdens on the Court, the Parties, pursuant to  
8 LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree to the following  
9 procedure for filing and sealing in connection with the motion to compel briefing, subject to the  
10 Court's approval.

11       1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its brief,  
12 declarations, exhibits, and all other evidence on which that Party relies which contain material  
13 designated Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.

14       2. By August 8, pursuant to LCR 5(g), the Parties will meet and confer and, as  
15 appropriate, file (1) public versions of their briefs, with necessary redactions, and (2)  
16 corresponding motion(s) to seal pursuant to LCR 5(g)(3). The Party seeking to maintain material  
17 under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal  
18 associated with the Parties' Papers.

19                   IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.  
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1 DATED July 3, 2025.

Respectfully submitted,

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IT IS SO ORDERED.

July 3, 2025

Dated



John H. Chun

United States District Judge